## REMARKS

Applicants have carefully considered the action dated October 7, 2008, in which the Examiner rejected claims 1 – 21 and 38 – 46 as anticipated under 35 U.S.C. § 102(b) by United States Patent Publication No. 2003/0033037 naming Yuen et al. as the inventors (the "Yuen publication"). In this response, the Applicants have amended claims 1, 11 – 13, 15 – 16, 38 – 39, and 46 to clarify the original scope and meaning of these claims. Applicants previously withdrew claims 22 – 37 from consideration in this application. Accordingly, claims 1 – 21 and 38 – 46 remain pending in this application. In view of the amendments set forth above and the following remarks, Applicants respectfully traverse the rejections, submit that all pending claims are in condition for allowance, and request reconsideration of the application.

### 35 U.S.C. § 102 Rejections

#### Claims 1 – 22

Applicants submit that claim 1 and its dependent claims (claims 2 – 22) are allowable over the Yuen publication, because the Yuen publication fails to disclose all limitations of independent claim 1.

Claim 1 is directed to a display entity that includes, in part, a display object that is associated with a process entity and features multiple graphic visualizations for the process entity. When a processor executes (*e.g.*, instantiates) the display object, one of the multiple graphic visualizations is displayable (*e.g.*, on a display device) to depict the process entity. As described

in the specification, a process control system can flexibly utilize such display object that includes multiple graphic visualizations in various contexts. For example, a process control system can utilize a single display object that includes graphical visualizations designed for a simulation environment and a maintenance environment (*i.e.*, the display object includes two graphic visualizations) simply with a selection of the appropriate visualization when the display object is instantiated for a given environment. Notably, the process control system can use the display object for each of the functions without extensive (if any) modification to the display object because, for example, a value for a property (*e.g.*, the on/off status of a pump) associated with a process entity is likely usable for different functions in a common manner. Similarly, a process control system can utilize a single display object that includes graphical visualizations for both a device with a large display and a portable device (with a small screen) simply with a selection of the appropriate visualization when the display object is instantiated for a given device.

Although it generally relates to process control systems, the Yuen publication does not disclose a display object that includes multiple graphic visualizations for a process entity as recited in claim 1. In fact, the Yuen publication appears to focus primarily on a technique for creating, from multiple templates, a compound control program that is executable on a process controller. In doing so, the Yuen publication describes a way to map control variables included in the templates so that the control variables in the program (*e.g.*, when instantiated) would be correctly mapped to the appropriate control

points. Applicants submit that no portion of these discussions relating to creating a control program is closely relevant to claim 1 or discloses all of its limitations.

With respect to graphics or graphical representation of process entities, the Yuen reference (i) merely mentions that templates could include "HMI graphics templates" (refer to page 3, paragraph 28), and (ii) generally describes that various components of a plant could be displayed graphically (refer to page 7, paragraphs 50 – 52 and Fig. 8). In any case, none of the discussions in the Yuen publication, relating to graphics or graphical representation of process entities, discloses a display object associated with a process entity that includes multiple graphic visualizations for that same process entity. For example, in Fig. 8, only a single graphical visualization depicts each of the process entities (such as MOTOR 1 and CONVEYOR 1). Furthermore, the Yuen publication fails to indicate that any of the graphical visualization for a given process entity is the one displayed among multiple graphical visualizations included in a display object for that process entity as required by claim 1.

In view of the foregoing, the Yuen publication does not disclose or suggest each and every limitation of claim 1, and thus, cannot anticipate the claim. Accordingly, Applicants respectfully submit that independent claim 1 and all of its dependent claims are in condition for allowance.

**Claims 38 – 46**

Applicants submit that independent claim 38 and its dependent claims (claims 39 – 46) are also allowable over the Yuen publication. Claim 38 is directed to a graphic display for use in a process plant and recites, in part, a

graphical object includes two or more (*i.e.*, multiple) visual representations of a process entity. The Applicants respectfully submit that the Yuen publication does not disclose or suggest this limitation for at least the reasons discussed above in connection with claim 1. Accordingly, independent claim 38 and all of its dependent claims are in condition for allowance.
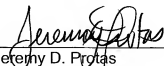
## CONCLUSION

Applicants respectfully request reconsideration of this application. For reasons provided above, Applicants submit that this application is in condition for allowance. Although no fees or petitions are believed to be due, Applicants hereby authorize the Commissioner to charge any fees or credit any overpayments to Deposit Account No. 13-2855 of Marshall, Gerstein, & Borun LLP under Order No. 06005/41117. If the Examiner wishes to discuss any of the foregoing comments or any claim amendments, Applicants kindly request the Examiner to contact the undersigned at the telephone number provided below.

Respectfully submitted,

January 7, 2009

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